

EXHIBIT THREE

Interests In, and Connections With,
Other Stations and Applications

Before the
Federal Communications Commission
Washington, D.C.

In re:)
)
APPLICATION OF:)
)
EDUCATIONAL RADIO FOUNDATION)
OF EAST TEXAS, INC.)
)
FOR A NEW NON-COMMERCIAL)
EDUCATIONAL FM STATION)
)
CHANNEL 201, JENA, LA)

EXHIBIT 3

**INTERESTS IN, AND CONNECTIONS WITH, OTHER STATIONS
AND APPLICATIONS.**

Educational Radio Foundation of East Texas, Inc., (the "Foundation" or "Applicant"), is the licensee of Non-Commercial, Educational FM Broadcast Stations KVNE and KGLY, Tyler, Texas.

The Foundation presently holds a construction permit (FCC File Number BPED 920818ID) to make minor modifications to station KVNE. There is pending before the Commission an application for an extension of time to make the modifications.

The Foundation is the Licensee of translator station K214BE, Shreveport, Louisiana.

Mr. Phillip Hook, a Director of the Foundation and its Vice President, and Ms. Shelley Chapin, a non-voting Director of the Foundation and its Treasurer, were General Partners in an application for a construction permit to build a new commercial FM broadcast station at Tyler, Texas. The application was voluntarily dismissed by the applicant as part of a settlement of the proceeding. Ms. Chapin and Mr. Hook's application was subject only to the standard comparative issues.

EXHIBIT FOUR

Planned Programming Service

Before the
Federal Communications Commission
Washington, D.C.

In re:)
)
APPLICATION OF:)
)
EDUCATIONAL RADIO FOUNDATION)
OF EAST TEXAS, INC.)
)
FOR A NEW NON-COMMERCIAL)
EDUCATIONAL FM STATION)
)
CHANNEL 201, JENA, LA)

EXHIBIT 4.

PLANNED PROGRAMMING SERVICE

The educational, cultural, civic and charitable purposes of the Educational Radio Foundation of East Texas, Inc. (the "Foundation" are to inform, educate and inspire members of the public. As part of its educational program, the Foundation encourages its Members, staff and listeners to become involved in their communities. Staff members of the Foundation and its existing stations are frequent speakers at local events. A listing of some of the organizations and activities for which speakers are regularly provided for is included in Exhibit 1.

The Foundation's staff participate in events hosted for the stations' listeners in the various areas served. The Foundation intends to establish similar links with its listeners and members of the communities to be served by the proposed station.

The proposed station will also serve as an outlet for educational programming furnished by educational institutions and as a training facility for local students of broadcasting and communication. The Foundation regularly accepts interns in both radio broadcast and engineering from local communities and educational institutions in the areas served by the Foundation's existing stations, including University of Texas at Tyler, LeTourneau University (Longview, Texas) Kilgore College (Kilgore, Texas), East Texas Baptist University (Marshall, Texas), the Tyler, Hawkins, Pine Tree and Longview Independent School Districts (Tyler, Hawkins, Pine Tree and Longview, Texas respectively), Texas College (Tyler, Texas) and Stephen F. Austin college (Nacogdoches, Texas). In fulfillment of this portion of its educational purposes, the Foundation will develop similar programs at the proposed station to accept interns from the areas it serves. Educational institutions in the Jena area, which the Foundation proposes that the new station cooperate with, include Louisiana College (Pineville, Louisiana), Louisiana State University at Alexandria (Louisiana), Northwestern State University (Natchitoches, Louisiana) and local public and private school districts.

The Foundation has operated an FM Translator in the Shreveport, Louisiana area for several years. Although not required to, the Foundation has endeavored to meet with its listeners in this area. During the stations open-line talk

program on July 29, 1994, over 50% of the calls to the existing Tyler station were from listeners to the Shreveport translator. While this percentage might be greater than would be found on an average day, the Foundation believes that it indicates strong interest in the Foundation's programming in the region in which Shreveport and Jena are located and that the Foundation's educational purposes are considered worthy by the citizens of the area.

In advancement of its program of educational, cultural, and civic activities, the Foundation has developed a substantial schedule of programming that educates, informs and motivates those who listen to KVNE, the Foundation's station in Tyler, Texas. A listing of the KVNE program schedule is annexed to Exhibit 2 as Attachment A. The Foundation plans to broadcast a schedule of programming over the proposed Jena station similar to that broadcast over KVNE, modified to meet the particular needs and interests of the Jena area.

A list of the program topics covered in the 1992-1994 calendar years over the Foundation's existing stations is annexed to Exhibit 2 as Attachment B. The Foundation plans to broadcast programs over the proposed station covering similar topics, modified to reflect the needs and interests of the Jena area.

The Foundation plans to construct a main studio within the city-grade contour of the station and employ two full time staff members at the proposed station. Under the Foundation's

supervision, the Jena staff will be expected to develop close ties with the area (if they do not already have such ties when hired). They, along with other members of the Foundation's staff, will meet regularly with listeners and the public at large in the Jena area to engage in on going dialogues regarding the needs and interests of that area. Programming on the Jena station will be tailored to meet the needs and interests of the Jena area and reflective of the Foundation's programming policies and nature and educational, civic and cultural purposes.

The Jena staff will be involved in educational, civic, cultural and inspirational organizations in the Jena area and, in concert with the Foundation's existing staff and Board of Directors, develop programming responsive to particular needs and interests of residents of Jena and the surrounding areas. News, public affairs programs and talk shows will be the vehicles through which some of the needs and interests will be met. Other needs and interests will be met through "long-form" programs, including programs offering guidance and support for persons facing various problems and opportunities.

It is anticipated that many of the topics listed in Attachment B of Exhibit 2 will be pertinent to the Jena area. Problems unique to the Jena area will be addressed through programs custom created for the proposed station by the existing Foundation staff and the staff to be hired for the Jena station.

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BROADCAST EQUAL EMPLOYMENT OPPORTUNITY

MODEL PROGRAM REPORT

1. APPLICANT

Name of Applicant EDUCATIONAL RADIO FOUNDATION OF EAST TEXAS, INC.	Address 2721 EAST ERWIN TYLER, TX 75708
Telephone Number (include area code) (903) 593-5863	

2. This form is being submitted in conjunction with:

Application for Construction Permit for New Station Application for Assignment of License

Application for Transfer of Control

(a) Call letters (or channel number of frequency) Channel 201

(b) Community of License (city and state) Jena, LA

(c) Service: AM FM TV Other (Specify) _____

INSTRUCTIONS

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to assure equal employment opportunity for women and minority groups (that is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American Indians or Alaskan Natives and Hispanics). This is submitted to the Commission as the Model EEO Program. If minority group representation in the available labor force is less than five percent (in the aggregate), a program for minority group members is not required. In such cases, a statement so indicating must be set forth in the EEO model program. However, a program must be filed for women since they comprise a significant percentage of virtually all area labor forces. If an applicant proposes to employ fewer than five full-time employees, no EEO program for women or minorities need be filed.

Guidelines for a Model EEO Program and a Model EEO Program are attached.

NOTE: Check appropriate box, sign the certification below and return to FCC:

- Station will employ fewer than 5 full-time employees; therefore no written program is being submitted.
- Station will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must complete all sections of this form.)

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 3rd day of August, 1994

Signed Phil Roth

Title Executive Director

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.
U.S. CODE, TITLE 18, SECTION 1001.

EEO PROGRAM

I. General Policy

It will be our policy to provide employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program.

II. RESPONSIBILITY FOR IMPLEMENTATION

The General Manager of the Foundation's stations, Shelley Chapin, is responsible for implementation of the Foundations EEO program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that the Foundation's program and policies are adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

III. POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following efforts will be made:

The station's employment application form will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State, or Federal agency if they believe they have been the victims of discrimination.

Appropriate notices will be posted informing applicants and employees that the Station is an Equal Opportunity Employer and of their right to notify an appropriate local, State, or Federal agency if they believe they have been the victims of discrimination.

We will seek the cooperation of unions, if represented at the Station, to help implement our EEO program and we will endeavor to include in any union contract(s) a non-discrimination clause.

When we advertise for employees, we will endeavor to include a notice in each advertisement that the Foundation is an Equal Opportunity Employer.

IV. RECRUITMENT

The employment profile at the Foundation's existing stations has been quite stable. Historically, there have been little turn-over in jobs.

To maintain an active, aggressive EEO profile, the Foundation undertakes periodically to publish various advertisements to urge potential applicants, particularly minorities and women, to file applications so that should a hiring opportunity occur, there will be a substantial pool of qualified minority applicants from which to choose. Many of these advertisements are placed in special publications that are widely circulated in minority communities, and support minority owners. The Foundation plans to extend this policy to the Jena area.

The members of the broad-based Board of Directors, and the staff and management of the Foundation and its stations, are committed both individually and as a group, to the fullest possible realization of equal employment opportunities for women and minorities. Through their various community contacts, Foundation management members "spread the word" and engage in a pattern of conduct designed to recruit a pool of qualified minorities and women for consideration should a hiring opportunity occur. The Foundation will establish similar relationships with civic, educational, and charitable organizations in the Jena area.

The Foundation will use only employment agencies that refer candidates without regard to their race, color, religion , national origin or sex. Examples of agencies the Foundation might use include the employment services of the States of Texas and Louisiana.

If the Foundation attempts to recruit potential employees from colleges and universities, such efforts will include various areas schools that have significant quantities of minority and women enrollments.

V. TRAINING

The Foundation plans to develop programs at the proposed station to accept interns from the areas it serves. Educational institutions in the Jena area, which the Foundation proposes that the new station cooperate with, include Louisiana College (Pineville, Louisiana), Louisiana State University at Alexandria (Louisiana), Northwestern State University (Natchitoches, Louisiana) and local public and private school districts.

The Foundation's resources are such that it can not undertake formal training of existing employees to upgrade their skills. However, the Foundation has a policy of developing its staff through on the job training.

Section V-B - FM BROADCAST ENGINEERING DATA	FOR COMMISSION USE ONLY File No. _____ ASB Referral Date _____ Referred by _____
--	--

Name of Applicant

Educational Radio Foundation of East Texas, Inc.

Call letters (if issued)

New

Is this application being filed in response to a window? Yes No

If Yes, specify closing date: _____

Purpose of Application: (check appropriate boxes)

- | | |
|--|---|
| <input checked="" type="checkbox"/> Construct a new (main) facility | <input type="checkbox"/> Construct a new auxiliary facility |
| <input type="checkbox"/> Modify existing construction permit for main facility | <input type="checkbox"/> Modify existing construction permit for auxiliary facility |
| <input type="checkbox"/> Modify licensed main facility | <input type="checkbox"/> Modify licensed auxiliary facility |

If purpose is to modify, indicate below the nature of change(s) and specify the file number(s) of the authorizations affected.

- | | |
|---|--|
| <input type="checkbox"/> Antenna supporting-structure height | <input type="checkbox"/> Effective radiated power |
| <input type="checkbox"/> Antenna height above average terrain | <input type="checkbox"/> Frequency |
| <input type="checkbox"/> Antenna location | <input type="checkbox"/> Class |
| <input type="checkbox"/> Main Studio location | <input type="checkbox"/> Other (Summarize briefly) |

File Number(s) _____

1. Allocation:

Channel No.	Principal community to be served:			Class (check only one box below)				
	City	Parish	State	<input type="checkbox"/> A	<input type="checkbox"/> B1	<input type="checkbox"/> B	<input type="checkbox"/> C3	
201	Jena	Caddo La Salle	LA	<input type="checkbox"/> C2	<input checked="" type="checkbox"/> C1	<input type="checkbox"/> C	<input type="checkbox"/> D	

2. Exact location of antenna.

- (a) Specify address, city, county and state. If no address, specify distance and bearing relative to the nearest town or landmark.
 1000A, 1000B Twin Tower Road, Dry Prong, LA 71423
- (b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude or East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed.

Latitude	31	33	54	Longitude	92	33	00
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3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? Yes No

If Yes, give call letter(s) or file number(s) or both.

KLAX-TV (BLCT-890705KG)

If proposal involves a change in height of an existing structure, specify existing height above ground level including antenna, all other appurtenances, and lighting, if any.

N/A

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 2)

4. Does the application propose to correct previous site coordinates? Yes No
 If Yes, list old coordinates. N/A

Latitude ° ' "	Longitude ° ' "
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5. Has the FAA been notified of the proposed construction? Yes No
 If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available. Existing tower, notification not required.

Exhibit No. N/A

Date _____ Office where filed _____

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway.

	Landing Area	Distance (km)	Bearing (degrees True)
(a)	<u>None</u>	_____	_____
(b)	_____	_____	_____

7. (a) Elevation: (to the nearest meter)

- (1) of site above mean sea level; 69 meters
- (2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 323 meters
- (3) of the top of supporting structure above mean sea level [(aX1) + (aX2)] * 391 meters

(b) Height of radiation center: (to the nearest meter) H = Horizontal; V = Vertical

- (1) above ground 286 meters (H)
- 286 meters (V)
- (2) above mean sea level [(aX1) + (bX1)] 355 meters (H)
- 355 meters (V)
- (3) above average terrain 307 meters (H)
- 307 meters (V)

* Apparent 1 meter discrepancy due to rounding. See Figure 3.

8. Attach as an Exhibit sketch(es) of the supporting structure, labelling all elevations required in Question 7 above, except item 7(bX3). If mounted on an AM directional-array element, specify heights and orientations of all array towers, as well as location of FM radiator.

Exhibit No. Tech.

9. Effective Radiated Power:

(a) ERP in the horizontal plane 15.5 kw (HM) 70 kw (VM)

(b) Is beam tilt proposed? Yes No

If Yes, specify maximum ERP in the plane of the tilted beam, and attach as an Exhibit a vertical elevational plot of radiated field.

Exhibit No. N/A

_____ kw (HM) _____ kw (VM)

*Polarization

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 3)

10. Is a directional antenna proposed?

Yes No

If Yes, attach as an Exhibit a statement with all data specified in 47 C.F.R. Section 73.316, including plot(s) and tabulations of horizontally and vertically polarized radiated components in terms of relative field.

Exhibit No.
N/A

11. Will the main studio be located within the 70 dBu or 3.16 mV/m contour?

Yes No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125.

Exhibit No.
N/A

12. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters, or any nonbroadcast (except citizens band or amateur) radio stations; or (b) within the blanketing contour, any established commercial or government receiving stations, cable head-end facilities, or populated areas; or (c) within ten (10) kilometers of the proposed antenna, any proposed or authorized FM or TV transmitters which may produce receiver-induced intermodulation interference?

Yes No

If Yes, attach as an Exhibit a description of any expected, undesired effects of operations and remedial steps to be pursued if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference (including that caused by receiver-induced or other types of modulation) to facilities in existence or authorized or to radio receivers in use prior to grant of this application. (See 47 C.F.R. Sections 73.315(b), 73.316(d) and 73.318.)

Exhibit No.
Tech.

13. Attach as an Exhibit a 7.5 minute series U.S. Geological Survey topographic quadrangle map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the requirements set forth in Instruction D for Section V. Further, the map must clearly and legibly display the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No.
Tech.

14. Attach as an Exhibit (name the source) a map which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.
Tech.

- (a) the proposed transmitter location, and the radials along with profile graphs have been prepared;
- (b) the 1 mV/m predicted contour and, for noncommercial educational applicants applying on a commercial channel, the 3.16 mV/m contour; and
- (c) the legal boundaries of the principal community to be served.

15. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km.) and population (latest census) within the predicted 1 mV/m contour.

Area 15,090 sq. km. Population 238,500

16. Attach as an Exhibit a map (Sectional Aeronautical charts where obtainable) showing the present and proposed 1 mV/m (60 dbu) contours.

Exhibit No.
N/A

Enter the following from Exhibit above: Gain Area N/A sq. mi.
Loss Area N/A sq. mi.

Percent change (gain area plus loss area as percentage of present area) N/A %.
If 50% or more this constitutes a major change. Indicate in question 2(c), Section I, accordingly.

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 4)

Exhibit No.
N/A

17. For an application involving an auxiliary facility only, attach as an Exhibit a map (*Sectional Aeronautical Chart or equivalent*) that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

(a) the proposed auxiliary 1 mV/m contour; and

(b) the 1 mV/m contour of the licensed main facility for which the applied-for facility will be auxiliary. Also specify the file number of the license. See 47 C.F.R. Section 73.1675. (File No.: _____)

18. Terrain and coverage data (*to be calculated in accordance with 47 C.F.R. Section 73.313*).

Source of terrain data: (*check only one box below*)

Linearly interpolated 30-second database 7.5 minute topographic map

(Source: N.G.D.C.)

Other (*briefly summarize*)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances to the 1 mV/m contour (kilometers)
0	290	68.0
45	303	69.0
90	310	69.5
135	295	68.4
180	307	69.3
225	316	70.0
270	316	70.0
315	318	70.1

Allocation Studies

(*See Subpart C of 47 C.F.R. Part 73*)

19. Is the proposed antenna location within 320 kilometers (199 miles) of the common border between the United States and Mexico?

Yes No

If Yes, attach as an Exhibit a showing of compliance with all provisions of the Agreement between the United States of America and the United Mexican States concerning Frequency Modulation Broadcasting in the 88 to 108 MHz band.

Exhibit No.
N/A

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 5)

20. Is the proposed antenna location within 320 kilometers of the common border between the United States and Canada?

Yes No

If Yes, attach as an Exhibit a showing of compliance with all provisions of the Working Agreement for Allocation of FM Broadcasting Stations on Channels 201-300 under The Canada-United States FM Agreement of 1947.

Exhibit No.
N/A

21. If the proposed operation is for a channel in the range from channel 201 through 220 (88.1 through 91.9 MHz), or if this proposed operation is for a class D station in the range from Channel 221 through 300 (92.1 through 107.9 MHz), attach as an Exhibit a complete allocation study to establish the lack of prohibited overlap of contours with other U.S. stations. The allocation study should include the following:

Exhibit No.
Tech.

- (a) The normally protected interference-free and the interfering contours for the proposed operation along all azimuths.
- (b) Complete normally protected interference-free contours of all other proposals and existing stations to which objectionable interference would be caused.
- (c) Interfering contours over pertinent arcs of all other proposals and existing stations from which objectionable interference would be received.
- (d) Normally protected and interfering contours over pertinent arcs, of all other proposals and existing stations, which require study to show the absence of objectionable interference.
- (e) Plot of the transmitter location of each station or proposal requiring investigation, with identifying call letters, file numbers and operating or proposed facilities.
- (f) When necessary to show more detail, an additional allocation study will be attached utilizing a map with a larger scale to clearly show interference or absence thereof.
- (g) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire Exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.
- (h) The name of the map(s) used in the Exhibit(s).

22. With regard to any stations separated by 53 or 54 channels (10.6 or 10.8 MHz) attach as an Exhibit information required in 1/ *(separation requirements involving intermediate frequency i.f. interference)*.

Exhibit No.
Tech.

23.(a) Is the proposed operation on Channel 218, 219, or 220?

Yes No

(b) If the answer to (a) is yes, does the proposed operation satisfy the requirements of 47 C.F.R. Section 73.207?

Yes No N/A

(c) If the answer to (b) is yes, attach as an Exhibit information required in 1/ regarding separation requirements with respect to stations on Channels 221, 222 and 223.

Exhibit No.
N/A

(d) If the answer to (b) is no, attach as an Exhibit a statement describing the short spacing(s) and how it or they arose.

Exhibit No.
N/A

1/ A showing that the proposed operation meets the minimum distance separation requirements. Include existing stations, proposed stations, and cities which appear in the Table of Allotments; the location and geographic coordinates of each antenna, proposed antenna or reference point, as appropriate; and distance to each from proposed antenna location.

SECTION V-B - FM BROADCAST ENGINEERING DATA (Page 6)

(e) If authorization pursuant to 47 C.F.R. Section 73.215 is requested, attach as an Exhibit a complete engineering study to establish the lack of prohibited overlap of contours involving affected stations. The engineering study must include the following:

Exhibit No.
N/A

- (1) Protected and interfering contours, in all directions (360), for the proposed operation.
- (2) Protected and interfering contours, over pertinent arcs, of all short-spaced assignments, applications and allotments, including a plot showing each transmitter location, with identifying call letters or file numbers, and indication of whether facility is operating or proposed. For vacant allotments, use the reference coordinates as transmitter location.
- (3) When necessary to show more detail, an additional allocation study utilizing a map with a larger scale to clearly show prohibited overlap will not occur.
- (4) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.
- (5) The official title(s) of the map(s) used in the exhibits(s).

24. Is the proposed station for a channel in the range from Channel 201 to 220 (88.1 through 91.9 MHz) and the proposed antenna location within the distance to an affected TV Channel 6 station(s) as defined in 47 C.F.R. Section 73.525?

Yes No

If Yes, attach as an Exhibit either a TV Channel 6 agreement letter dated and signed by both parties or a map and an engineering statement with calculations demonstrating compliance with 47 C.F.R. Section 73.525 for each affected TV Channel 6 station.

Exhibit No.
Tech.

25. Is the proposed station for a channel in the range from Channel 221 to 300 (92.1-107.9 MHz)?

Yes No

If Yes, attach as an Exhibit information required in 1/. (Except for Class D (secondary) proposals.)

Exhibit No.
N/A

26. Environmental Statement (See 47 C.F.R. Section 1.1301 et seq.)

Would a Commission grant of this application come within Section 1.1307 of the FCC Rules, such that it may have a significant environmental impact?

Yes No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by Section 1.1311.

Exhibit No.
N/A

If No, explain briefly why not. Categorically excluded per 47 CFR 1.1306.
See Technical Narrative.

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed)	Relationship to Applicant (e.g., Consulting Engineer)
David E. Dickmann	Technical Consultant
Signature	Address (Include ZIP Code)
	240 N. Washington Blvd., Suite 700 Sarasota, Florida 34236
Date	Telephone No. (Include Area Code)
August 2, 1994	(813) 366-2611

TECHNICAL EXHIBIT
APPLICATION FOR FM CONSTRUCTION PERMIT
EDUCATIONAL RADIO FOUNDATION, INC.
JENA, LOUISIANA

August 2, 1994

CH 201C1 15.5 KW(H), 70 KW(V) 307 M

TECHNICAL EXHIBIT
APPLICATION FOR FM CONSTRUCTION PERMIT
EDUCATIONAL RADIO FOUNDATION, INC.
JENA, LOUISIANA
CH 201C1 15.5 KW(H), 70 KW(V) 307 M

Table of Contents

Technical Narrative

Figure 1	Proposed Transmitter Location
Figure 2	Proposed Antenna and Supporting Structure
Figure 3	Tabulation of Average Elevations and Distances to Coverage Contour
Figure 4	Predicted Coverage Contours
Figure 5	Allocation Study
Figure 6	TV Channel 6 Protection Study
Attachment	Antenna Vertical Radiation Pattern

TECHNICAL EXHIBIT
APPLICATION FOR FM CONSTRUCTION PERMIT
EDUCATIONAL RADIO FOUNDATION, INC.
JENA, LOUISIANA
CH 201C1 15.5 KW(H), 70 KW(V) 307 M

Technical Narrative

The technical exhibit of which this narrative is part was prepared on behalf of Educational Radio Foundation of East Texas, Inc. (herein "Educational Radio Foundation, Inc." or "ERF"). ERF is applying for a new, non-commercial, educational FM station to serve Jena, Louisiana. By means of this application, ERF proposes to side-mount an FM antenna on the existing tower of television station KLAX-TV, Alexandria, Louisiana. It is proposed to operate on channel 201C1 with an effective radiated power of 15.5 kilowatts in the horizontal polarization and 70 kilowatts in the vertical polarization at an antenna height above average terrain of 307 meters.

The proposal would not be subject to environmental processing in accordance with 47 CFR 1.1306. The Federal Aviation Administration has not been notified as no changes in the existing tower structure are proposed. It is believed that the proposal conforms with all applicable rules and regulations of the Federal Communications Commission (FCC).

Proposed Transmitter Location

The proposed transmitting facility will consist of two 8-bay FM antennas, one vertically polarized and one horizontally polarized, side-mounted near the top of the existing KLAX-TV tower which is located at 1000A, 1000B

Twin Towers Road, Dry Prong, Louisiana. A power splitter will be used to distribute the antenna input power in order to achieve the proposed horizontal and vertical effective radiated powers. The location is uniquely described by the following geographic coordinates, which were obtained from the KLAX-TV data on file with the FCC:

31° 33' 54" North Latitude

92° 33' 00" West Longitude.

A map showing the transmitter location is included herein as Figure 1. A sketch showing the proposed antenna and supporting structure is included herein as Figure 2.

Interference Considerations

There is one known broadcast facility within 60 meters of the proposed antenna, KLAX-TV, channel 31, Alexandria, Louisiana. (It is proposed to mount the ERF antenna below the KLAX-TV antenna on the existing KLAX-TV tower.) The "blanketing" contour of a 70-kilowatt FM station, as defined by 47 CFR 73.318, extends approximately 3.3 kilometers from the transmitter site. Although there are residences within this distance, no adverse impact is expected. In addition to KLAX-TV, within 10 kilometers from the proposed antenna, there is one other known TV facility and two known FM facilities¹.

¹The TV station is KLPA-TV, channel 25, Alexandria, Louisiana. The FM stations are KLSA, channel 214C, Alexandria, Louisiana and KVDP, channel 206A, Dry Prong, Louisiana.

No interference problems, blanketing or otherwise, are expected from the proposed facility, however, the applicant recognizes its responsibility to remedy complaints of blanketing interference as required by 47 CFR 73.318 and to protect existing facilities in accordance with applicable rules.

The proposed facility is not within 199 miles (320 kilometers) of the Canadian or Mexican borders. It is not in the vicinities of either the National Radio Quiet Zone in Virginia/West Virginia nor the Table Mountain Radio Quiet Zone in Colorado. The nearest FCC Monitoring Station is at Kingsville, Texas approximately 690 kilometers distant; obviously, no interference is expected to this facility.

Coverage Contour

The extent of the predicted 60 dBu coverage contour for the proposed facility was determined in accordance with the provisions of 47 CFR 73.313. In accordance with current FCC practice, no consideration was given to terrain roughness correction factors.

The average terrain elevations from 3 to 16 kilometers from the proposed site along the standard eight radials evenly spaced at 45-degree intervals were determined using the National Geophysical Data Center's 30-second terrain database. The antenna radiation center heights above average terrain in the individual radial

directions and the effective radiated power were used in conjunction with the F(50,50) curves of 47 CFR 73.333 (Figure 1) to determine distances to the 60 dBu contour. Figure 3 contains a tabulation of average elevations and distances to the 60 dBu coverage contour. Figure 4 is a map showing the predicted 60 dBu coverage contour.

Population and Area

The population to be served within the predicted 60 dBu contour was determined by a computer program which adds the populations of census districts having centroids within the contour. The 1990 census was employed. The land area within the 60 dBu contour was determined by means of a computer program using a root-mean-squared method of calculation. The predicted 60 dBu contour encompasses an estimated 15,090 square kilometers in which an estimated 238,500 persons reside.

Allocation Considerations

The proposed facility complies with the requirements of 47 CFR 73.509 with respect to all existing and proposed stations and allotments. The proposed facility also complies with 47 CFR 73.207 with respect to all intermediate frequency (IF) related stations.

Figure 5 is an allocation study with respect to pertinent proposed and authorized stations and allotments. Sheet 1 of Figure 5 is a plot of the protected and interfering contours along all azimuths for the applicant's proposed facility and along the required

azimuths for other facilities of concern. As can be seen on this plot, the proposed facility results in prohibited contour overlap with the proposed new channel 201C station at Marksville, Louisiana (FCC File No. 940214MA). This proposal is, therefore, mutually exclusive with the proposed Marksville station. No other prohibited overlap occurs with respect to any other FM facilities. As the proposed 54 dBu [F(50,10)] interfering contour lies very close to the 60 dBu [F(50,50)] protected contour of the new proposed channel 202A station at Ruston, Louisiana (File No. BPED-940331MA), a more detailed plot of these two contours is shown on Sheet 2 of Figure 5. Sheet 3 of Figure 5 is a tabulation demonstrating that the proposed ERF channel 201C1 facility complies with the provisions of 47 CFR 73.509 and 47 CFR 73.207 with respect to other FM stations in the vicinity of the proposal.

Distances to the contours for all stations involved in the allocation study were determined using the method of 47 CFR 73.313. The average terrain elevations from 3 to 16 kilometers from the transmitter site of each station along the standard eight radials and sufficient supplemental radials to clearly define the extent of the contours were determined from the NGDC 30-second terrain database. The antenna radiation center heights above average terrain in the individual radial directions and corresponding effective radiated powers were used in conjunction with the F(50,50) and F(50,10) curves of 47

CFR 73.333 to determine distances to the protected and interfering contours.

TV Channel 6 Protection

The Commission requires that non-commercial, educational FM facilities provide interference protection to affected TV channel 6 facilities as defined in 47 CFR 73.525. In accordance with 47 CFR 73.525(a)(1), TV channel 6 facilities within 265 kilometers of the proposed channel 201 FM facility must be protected. A search of the Commission's TV database of June 27, 1994 shows two TV channel 6 facilities within this distance: KTAL-TV, Texarkana, Texas and KFDM-TV, Beaumont, Texas. Accordingly, a TV channel 6 protection study was done with respect to these two facilities.

Attached as Figure 6 is a map showing the 47 dBu, Grade B, coverage contours for the above mentioned TV channel 6 stations along with the corresponding FM channel 201 interfering contour for the proposed facility. As can be seen from the map, there is no predicted interference to either affected TV channel 6 station.

The permissible ERP of 17.25 kilowatts used in determining the extent of the proposed, predicted interfering contour was calculated in accordance with 47 CFR 73.525(e)(4)(ii) using the formula: $ERP = H + V/A$, where $H = 15.5$ kW, $V = 70$ kW and $A = 40$ since the area of concern lies entirely outside the limits of a city of 50,000 or more population. In accordance with 47 CFR 73.525(e)(1)(iii), an adjustment of 6 dB was added to the